Exhibit B

STEVE SPRITZER

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1              IN THE UNITED STATES DISTRICT COURT
               FOR THE SOUTHERN DISTRICT OF NEW YORK
2              CASE NO.: 1:19-CV-10720-LGS-BM
   -------------------------------------------------------x
3
   DAVIDSON HENAO, MIGUEL MERO, OMOBOWALE AVOSEH,
4  RASHEEM MARTIN and SHAWN WILLIAMS, for themselves
   and all others similarly situated,
5
                        Plaintiff,
6
        - against -
7
   PARTS AUTHORITY, LLC, PARTS AUTHORITY, INC.,
8  YARON ROSENTHAL, NORTHEAST LOGISTICS, INC.,
   d/b/a "Diligent Delivery Systems," ARIZONA
9  LOGISTICS, INC., d/b/a "Diligent
   Delivery Systems," BBB LOGISTICS, INC., d/b/a
10 "Diligent Delivery Systems,"
   MICHIGAN LOGISTICS, INC. D/b/a "Diligent
11 Delivery Systems", LARRY BROWNE, DOES 1-20
   d/b/a "Diligent Delivery Systems," and
12 DOES 21-40,

13                      Defendants.

14 -------------------------------------------------------x
                                         May 18, 2021
15                                       10:04 a.m.

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18       VIDEOTAPED DEPOSITION of STEVE SPRITZER,

19  held REMOTELY, before Victoria Russo, a Certified

20  Shorthand Reporter and Notary Public within and for

21  the States of New York and New Jersey, commencing

22  on the above date and time.

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STEVE SPRITZER

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1   MS. STILLER: Again, I'm going to

2   object. I think it's overbroad, but you can answer,

3   if you can.

4   A.   I cannot.

5   Q.   Approximately?

6   A.   Hundreds.

7   Q.   Aside from litigation, has Parts

8   Authority ever claimed that there is a burden

9   associated with searching all mailboxes?

10   A.   Yes.

11   MS. STILLER: I object to the form of

12   the question. I think it's overbroad.

13   You can answer.

14   Q.   When did -- when did that occur?

15   A.   I cannot pinpoint a specific time that

16   that occurred and it occurs.

17   Q.   Why does it occur? Can you describe

18   any of those occurrences?

19   A.   Yes.

20   Q.   Please do so.

21   MS. STILLER: Again, I'm going to

22   object since it is not related to the scope of the

23   deposition, but you can answer.

24   A.   There could be an e-mail that came in

25   from a vendor that we weren't sure whose mailbox it

STEVE SPRITZER

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1   is, if a person no longer works here and an invoice

2   is missing, things of that nature.

3   Q.   And Parts Authority would object to

4   running that search as overly broad and burdensome?

5   A.   If the search crashed the first time,

6   yes.

7   Q.   How many times does the search crash

8   the first time?

9   A.   Depending on how --

10   MS. STILLER: Note my objection, but

11 you can answer.

12   A.   Depending on how broad the search

13 criteria is, most of the time.

14   Q.   Are there times where the search

15 crashes the first time and then Parts Authority just

16 runs a second search?

17   A.   There are times that has happened.

18   Q.   Are there times when the search

19 doesn't crash the first time?

20   A.   Yes.

21   Q.   How many times -- is there anything

22 different between running a search the first time or

23 running it again after the system crashed?

24   MS. STILLER: I'm going to object to

25 the form of the question.